



SOLID WASTE DIVISION

559 LOW GAP ROAD
UKIAH, CALIFORNIA 95482
(707) 463-4078
FAX: (707) 468-3427

March 5, 1998

Mr. Scott Walker, C.E.G.
Closure & Remediation Branch
California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

RE: COMMENTS ON SB 1330 DRAFT REGULATIONS

Dear Scott:

This letter follows the public workshop last week in Red Bluff, CA, wherein the draft regulations for SB 1330 (Farm & Ranch Cleanup Program) were discussed. I have the following comments:

- 1) Section 19003 (Site Ranking Criteria): If proposed projects are prioritized according to factors listed under this section, then the ranking system should be spelled out. Otherwise, the regulations should state that each factor carries equal importance.
- 2) Section 19004 (Eligible & Ineligible Remedial Actions): I suggest that "barriers and barricades" be added to the list of remedial actions which funds can be used.
- 3) General Comment: If the CIWMB is looking to Local Enforcement Agents (LEA's) to administer this program at the local level, then the 5% ceiling on LEA administrative costs appears very low.
- 4) General Comment: A regulatory provision for reimbursement after-the-fact would be very helpful.

Scott, thanks for the opportunity to comment on the draft regulations. Please contact me at (707) 463-0487 if you have any questions.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul Cayler", is written over the typed name.

Paul Cayler,
Solid Waste Division Director

cc: file Illegal Dump Clean Up
Dave Bengston, MC Ag. Commissioner
David Koppel, MCEHD
Mike Sweeney, MSWMA

MAR - 9 1998
9-17

COURTHOUSE
939 W. MAIN ST.
EL CENTRO, CA 92243



TELEPHONE
(760) 339-3333
(760) 339-4204
(760) 339-4205
FAX:
(760) 352-1309

**DEPARTMENT OF HEALTH SERVICES
DIVISION OF ENVIRONMENTAL HEALTH**

February 10, 1998

California Integrated Waste Management Board
8800 Cal Center Drive
Sacramento, CA 95826

Attention: Scott Walker, Permitting and Inspection Division

Subject: SB1330 Farm and Ranch Cleanup Program

Dear Mr. Walker,

The Imperial County LEA will not be able to attend your upcoming workshops on this Senate Bill, however, we would like to make a general comment that you should very well consider.

Most grants are written with such restrictions and necessary research of data, that very few grants truly become available.

Try and keep things loose and simple in your regulations so that the intent of the regulations can be carried out – namely cleaning up farmland where the farmer has been dumped on.

Sincerely,

Thomas L. Wolf, Manager

By:

A handwritten signature in dark ink, appearing to read 'Gerald Quick', is written over the printed name.

Gerald Quick, REHS III
Local Enforcement Agency – Permitting

T:\t\g\y\df:\users\alice\SB1330.doc

12

9-18



1020 12th Street, Suite 400
Sacramento, CA 95814
(916) 447-4806 448-3154 fax

Chair

Claud R. Neely
Lassen County

Vice Chair

LaVada Erickson
Siskiyou County

**Executive Director, Treasurer
& Secretary**

Marcia Basque
RCRC/ESJPA

**Technical Advisory
Committee Chair**

Greg Newbry
Mono County

**Technical Advisory
Committee Vice Chair**

Gerry de Roco
Glenn County

Executive Committee

Claud R. Neely
LaVada Erickson
Greg Newbry

Program Director

John Brooks
RCRC/ESJPA

Environmental Services Joint Powers Authority

Regional Council of Rural Counties

March 3, 1998

Scott Walker
CIWMB
8800 Cal Center Dr.
Sacramento, CA 95826

Re: SB 1330 – Farm and Ranch Cleanup

Dear Mr. Walker,

I am writing to request that I be placed on the mailing list for future SB 1330 related materials and, also, that I be sent copies of the materials passed out at the workshops. SB 1330 is an important issue with the rural counties and many request status reports from me. To better apprise the ESJPA members of the contents of the regulations and progress, I would like to invite you to give a short presentation at our Wednesday, April 15 Board meeting at the Sutter Club in Sacramento.

I have had an opportunity to review the preliminary draft regulations and believe that CIWMB staff has done an excellent job in preparing the draft regulations in a short timeframe. I look forward to working with you throughout the process and into implementation of the program.

Sincerely,

John S. Brooks

cc: ESJPA Members

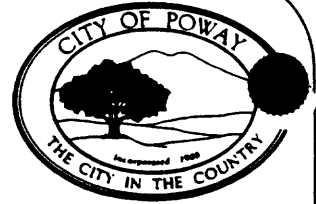
ESJPA/Letters/CIWMB/SB1330

Member Counties:

Alpine * Amador * Calaveras * Colusa * Del Norte * El Dorado * Glenn * Inyo * Lake *
Lassen * Mariposa * Modoc * Mono * Nevada * Plumas * Sierra * Siskiyou * Trinity *
Tuolumne

CITY OF POWAY

DON HIGGINSON, Mayor
JAY GOLDBY, Deputy Mayor
MICKEY CAFAGNA, Councilmember
BOB EMERY, Councilmember
BETTY REXFORD, Councilmember



February 9, 1998

Scott Walker
CIWMB Permitting and Inspection Division
8800 Cal Center Drive
Sacramento, CA 95826

Dear Mr. Walker:

I will be unable to attend the public workshops concerning the implementation of SB 1330, Farm and Ranch Cleanup Program but I have reviewed the bill and the fact sheet from your department and would like to provide the following comment.

It is our experience that properties in rural areas which are not currently being used for agricultural purposes are more likely to be used for dumping than are those where active farming or ranching is taking place. This may be because properties without agricultural activities are under less supervision. We would encourage you to include a definition which includes all properties zoned for agricultural use as farm and ranch land and include them in this program.

I would appreciate being placed on any mailing list for future notifications concerning this program. If you have any questions, please feel free to call me.

Sincerely,

Reba Wright-Quastler

Reba Wright-Quastler, Ph.D., AICP
Director of Planning Services

C:\DATA\LETTER\SB1330.WPD

9-20